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[Additional counsel appear on signature page.]

**Document Filed Electronically**

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

|                                   |   |                               |
|-----------------------------------|---|-------------------------------|
| DAVID MURDOCK, Individually and   | ) | No. 2:07-cv-03376-WHW-MF      |
| as Father and Next friend of BEAU | ) |                               |
| FARISH MURDOCK and ANABELLE       | ) | <u>CLASS ACTION</u>           |
| SAGE MURDOCK, Minor Children,     | ) |                               |
| On Behalf of All Others Similarly | ) | PLAINTIFF'S MOTION FOR        |
| Situated,                         | ) | APPOINTMENT OF INTERIM LEAD   |
|                                   | ) | COUNSEL UNDER FED. R. CIV. P. |
| Plaintiff,                        | ) | 23(G)                         |
|                                   | ) |                               |
| vs.                               | ) |                               |
|                                   | ) |                               |
| RC2 CORPORATION, et al.,          | ) |                               |
|                                   | ) |                               |
| Defendants.                       | ) |                               |
|                                   | ) |                               |

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**PLEASE TAKE NOTICE** that on Monday, September 24, 2007, counsel for plaintiff will apply before the Court for an Order pursuant to Fed. R. Civ. P. 23(G) appointing the law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP as interim lead counsel in this matter.


In support of this motion, plaintiff will rely upon the Memorandum of Law and Declaration of Peter S. Pearlman submitted herewith.

A proposed form of Order is enclosed.

DATED: August 31, 2007

Respectfully Submitted,

COHN LIFLAND PEARLMAN  
HERRMANN & KNOPF LLP  
PETER S. PEARLMAN  
JEFFREY W. HERRMANN

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